

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION

**RAUL NOVOA, JAIME CAMPOS  
FUENTES, ABDIAZIZ KARIM, and  
RAMON MANCIA**, individually and  
on behalf of all others similarly situated,

*Plaintiffs,*

v.

**THE GEO GROUP, INC.,**

*Defendant.*

Civil Action No. 5:17-cv-02514-JGB-SHKx

**DECLARATION OF ANDREW  
FREE IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION**

I, R. Andrew Free, declare that the following is true and correct based upon my personal knowledge:

1. I am an attorney for the Plaintiff in the above-captioned action.
2. I am a 2010 graduate of Vanderbilt University Law School, where I was awarded the Bennett Douglas Bell Memorial Prize.
3. I have been practicing law since 2011.
4. During law school, I served as a Community Services Team Intern at Holland & Knight in Washington, D.C., and as a Summer Associate at Winston & Strawn, LLP in San Francisco, California. Following graduation, I began working and eventually assumed the position of Litigation Counsel at Ozment Law in Nashville, Tennessee, which is a boutique immigration and civil rights firm. In September 2013, I founded my own law practice and became Of Counsel to Barrett Johnston Martin & Garrison in Nashville, Tennessee.
5. I am currently Managing Attorney at the Law Office of Andrew Free.

1           6.     I was selected as a 2017 SuperLawyers MidSouth Rising Star for the area  
2 of Civil Rights.

3           7.     My firm and our co-counsel in this litigation are committed to advancing  
4 all costs of this litigation.

5           8.     I am proficient in Spanish. My Paralegal is a native Spanish speaker.

6           9.     I have spent roughly 1000 hours over more than five years investigating  
7 the factual and legal bases for the claims in this case, including filing and litigating  
8 Freedom of Information Act (“FOIA”) requests, interviewing current and former  
9 CoreCivic detainees and advocates, and reviewing corporate payroll records issued by  
10 CoreCivic.

11          10.    I am currently lead or co-lead class counsel in *Menocal v. The GEO Group,*  
12 *Inc.*, No. 1:14-cv-02887, 113 F. Supp. 3d. 1125 (D. Colo.) and *Nwauzor v. The GEO Group,*  
13 *Inc.*, No. 3:17-cv-05769, 287 F. Supp. 3d. 1158, 2017 WL 6034365 (W.D. Wash.). Each  
14 of these cases alleges wage theft, unjust enrichment, and/or forced labor at private civil  
15 immigration detention facilities.

16          11.    In addition, I am or was counsel for the following cases in the federal  
17 district courts:

18               a.     *Villegas v. Metropolitan Government of Davidson County/Nashville –*  
19 *Davidson County Sheriff's Office*, No. 3:09-cv-00219, 907 F.Supp.2d 907 (M.D. Tenn.  
20 2012)

21               b.     *Dionicio v. Allison*, No. 3:09-cv-00575 (M.D. Tenn. 2011)

22               c.     *Ramos-Macario v. Jones*, No. 3:10-cv-00813, 2011 WL 831678 (M.D.  
23 Tenn. 2011)

24               d.     *Tapia-Tovar v. Epley*, No. 3:11-cv-00102 (M.D. Tenn.)

25               e.     *Renteria-Villegas v. Metropolitan Government of Nashville & Davidson*  
26 *County*, No. 3:11-cv-00218, 796 F.Supp.2d 900 (M.D. Tenn. 2011)

27               f.     *Ozment v. United States Department of Homeland Security, Immigration and*  
28 *Customs Enforcement*, No. 3:11-cv-00429 (M.D. Tenn.)

- g. *Cabuec-Castro v. Worsham*, No. 3:11-cv-00928 (M.D. Tenn.)
- h. *Escobar v. Gaines*, No. 3:11-cv-00994 (M.D. Tenn.)
- i. *Martinez v. Gaines*, No. 3:11-cv-01030 (M.D. Tenn.)
- j. *Rios-Quiroz v. Williamson County, Tennessee*, No. 3:11-cv-01168 (M.D. Tenn.)
- k. *Ramirez-Mendoza v. Maury County, Tennessee*, No. 1:12-cv-00014 (M.D. Tenn.)
- l. *United Steelworkers of America, Local Union 9426 v. Metropolitan Government of Nashville, Davidson County, Tennessee*, No. 3:12-cv-00120 (M.D. Tenn.)
- m. *Garcia v. Department of Homeland Security*, No. 3:12-cv-00354 (M.D. Tenn.)
- n. *Rosenboom v. Contec Construction, LLC*, No. 3:12-cv-00494 (M.D. Tenn.)
- o. *Santos-Garcia v. Cheatham County, Tennessee*, No. 3:12-cv-00826 (M.D. Tenn.)
- p. *Patel v. Miller*, 3:13-cv-00242 (M.D. Tenn.)
- q. *Moore v. Trevecca Nazarene University*, No. 3:13-cv-00276 (M.D. Tenn.)
- r. *Ramirez-Anzo v. Department of Homeland Security, U.S. Immigration and Customs Enforcement*, No. 3:13-cv-00682 (M.D. Tenn.)
- s. *Ajualip-Miranda v. United States Department of Homeland Security, U.S. Immigration and Customs Enforcement*, No. 3:13-cv-00715 (M.D. Tenn.)
- t. *Harrington v. Haslam*, No. 3:13-cv-01090 (M.D. Tenn.)
- u. *Retana-Correa v. Morris Drywall Systems, Inc.*, No. 3:13-cv-728 (M.D. La.)
- v. *Stevens v. United States Department of Justice*, No. 1:13-cv-2780 (N.D. Ill.)
- w. *Stevens v. Department of Homeland Security*, No. 1:13-cv-3382 (N.D. Ill.)
- x. *Stevens v. United States Department of State*, No. 1:13-cv-5152 (N.D. Ill.)

- y. *Howe v. Aytes*, No. 2:14-cv-00077 (M.D. Tenn.)
- z. *Beasley v. Turner*, No. 1:14-cv-00148 (M.D. Tenn.)
- aa. *Bentz v. Sumner County, Tennessee*, No. 3:14-cv-02300 (M.D. Tenn.)
- bb. *Contreras v. Corsicana Bedding, Inc.*, No. 4:14-cv-00006-HSM-SKL  
(E.D. Tenn.)
- cc. *Pascual v. Corsicana Bedding, Inc.*, No. 4:14-cv-00008-HSM-SKL (E.D.  
Tenn.)
- dd. *Gonzalez v. United States of America*, No. 2:14-cv-00696-CJB-JCW  
(E.D. La.)
- ee. *Stevens v. U.S. Dep't of Homeland Security, Immigration & Customs  
Enforcement*, No. 1:14-cv-3305 (N.D. Ill.)
- ff. *Figueroa-Barajas v. Lund*, No. 2:14-cv-1051-SSV-JCW (E.D. La.)
- gg. *Ayala-Rosales v. Teal*, No. 4:14-cv-00048-HSM-CHS (E.D. Tenn.)
- hh. *Stevens v. U.S. Dep't of Homeland Security*, No. 1:14-cv-08133 (N.D. Ill.)
- ii. *Quick v. Hamilton County, Tennessee*, No. 1:14-cv-00478-CLC-SKL  
(E.D. Tenn.)
- jj. *Medina-Resendiz v. Kaylor*, No. 1:15-cv-00086-TRM-CHS (E.D.  
Tenn.)
- kk. *Lopez v. Kaylor*, No. 1:15-cv-00202-TRM-CHS (E.D. Tenn.)
- ll. *Mehta v. U.S. Department of State*, No. 2:15-cv-01533-RSM (W.D.  
Wash.)
- mm. *Benjamin v. U.S. Department of State*, No. 1:15-cv-00160-ABJ (D.D.C.)
- nn. *Koukoulomates v. Kerry*, No. 1:15-cv-00384 (D.D.C.)
- oo. *Sandoval v. Loy*, No. 3:15-cv-00444 (M.D. Tenn.)
- pp. *Davis v. Grinder*, No. 3:15-cv-00763 (M.D. Tenn.)
- qq. *Gutierrez-Cruz v. Lucero*, No. 5:15-cv-00631 (W.D. Tex.)
- rr. *RAICES, Inc. v. U.S. Immigration and Customs Enforcement*, No. 1:15-  
cv-01318-JEB (D.D.C.)

- ss. *Contreras-Casco v. Lucero*, No. 5:15-cv-00716 (W.D. Tex.)
- tt. *Quiroz-Trejo v. Rivera*, No. 3:15-cv-01020 (M.D. Tenn.)
- uu. *Melendez de Segovia v. Johnson*, No. 1:15-cv-02019 (D.D.C.)
- vv. *Cadet v. Kerry*, No. 1:16-cv-00328 (D.D.C.)
- ww. *Doe v. United States of America*, No. 3:16-cv-856 (M.D. Tenn.).
- xx. *American-Arab Anti-Discrimination Committee v. U.S. Customs and Border Protection*, No. 1:17-cv-00708-CRC (D.D.C.)
- yy. *Stevens v. U.S. Immigration and Customs Enforcement*, No. 1:17-cv-2853 (N.D. Ill.)
- zz. *Goodman v. Arpaio*, 2:16-cv-04388-JJT-MHB (D. Ariz.)

12. Several of these cases are putative class or collective actions, including *Menocal v. The GEO Group, Inc.*, 320 F.R.D. 258 (D. Colo. 2017); *Mehta v. U.S. Department of State*, No. 2:15-cv-01533-RSM (W.D. Wash.) (putative class of 60,000+ foreign nationals); *Pascual v. Corsicana Bedding, Inc. No.*, 4:14-cv-00008-HSM-SKL (E.D. Tenn.) (certified collective action of 80+ workers, predominantly non-English speakers); *Ramirez-Mendoza v. Maury County, Tennessee*, No. 1:12-cv-00014 (E.D. Tenn.) (putative class of unlawfully held non-citizen detainees); and *Retana-Correa v. Morris Drywall Systems*, No. 3:13-cv-728 (M.D. La.).

13. Some of these cases were certified as 29 U.S.C. § 216(b) collective actions. *See Pascual v. Corsicana Bedding, Inc. No.*, 4:14-cv-00008-HSM-SKL (E.D. Tenn.); *Retana-Correa v. Morris Drywall Systems*, No. 3:13-cv-728 (M.D. La.).

14. A substantial portion of my district court litigation experience involves exposing or remedying unlawful treatment by government officials or their agents of suspected non-citizens in various forms of custody or immigration detention, or requests for records relating thereto. A substantial portion of the remainder of these cases involves federal and/or state labor claims on behalf of immigrant workers.

15. As part of my representation of clients in Freedom of Information Act lawsuits and damages actions under *Bivens* and the Federal Tort Claims Act, I have

1 become uniquely familiar with the agreements, policies, procedures, regulations, and  
2 general legal regimes governing noncitizens in ICE detention, and the conditions under  
3 which they are forced to perform labor. *See, e.g., Stevens v. U.S. Dept. of Homeland Security*  
4 *– U.S. Immigration and Customs Enforcement*, No. 1:14-cv-3305 (N.D. Ill.) (demanding  
5 agency records regarding the Voluntary Work Program, grievances by detainees involved  
6 in the program, and policy and procedure guidance from the agency regarding the  
7 program's function). Through these cases, I have amassed and reviewed tens of  
8 thousands of pages of primary source documents relating to ICE detention, private  
9 prison contracting, and the work detainees and others perform in ICE facilities.

10 16. In addition to my federal district court practice, I have represented or  
11 advised hundreds of individuals in various stages of deportation proceedings and civil  
12 immigration proceedings. This experience includes extensive representation of  
13 individuals detained at privately-run immigration facilities across the United States.

14 17. I am a frequent speaker and presenter at bar and professional training  
15 events such as the American Immigration Lawyers Association and the National  
16 Immigration Project of the National Lawyers Guild. I previously served as Co-Chair of  
17 the Committee on the Rights of Immigrants, within the Individual Rights and  
18 Responsibilities Section of the American Bar Association.

19 18. Through direct interviews with these clients regarding the conditions of  
20 their confinement and analysis of documents from The GEO Group, Inc. and ICE, I  
21 have become intimately familiar with the processes, procedures, and practices  
22 surrounding the detainee work program and forced labor programs at GEO facilities in  
23 California and in other locations.

24 19. I have also consulted with, represented, and advised former employees of  
25 private prison corporations in employment-related matters.

26 20. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the  
27 foregoing is true and correct to the best of my knowledge.  
28

Dated: September 18, 2019

/s/ R. Andrew Free

R. Andrew Free (Admitted *pro hac vice*)

State of Tennessee Bar # 030513

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